

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

BOARDS OF TRUSTEES OF THE  
CEMENT MASONS & PLASTERERS  
HEALTH & WELFARE TRUST, *et al.*,

Plaintiffs,

v.

KELAYE CONCRETE LLC, a  
Washington limited liability company,  
UBI No. 603213162, Contractor's  
License No. KELAYCL876K2,

Defendant.

NO. 2:15-cv-01866-RAJ

**MOTION FOR ORDER OF DEFAULT**

Plaintiffs Boards of Trustees of the Cement Masons & Plasterers Health & Welfare Trust, Cement Masons and Plasterers Retirement Trust, Western Washington Cement Masons Journeyman and Apprentice Training Trust, and Washington Construction Industry Substance Abuse Program Funds move the Court to enter an order adjudging defendant Kelaye Concrete LLC to be in default. This motion is based on the pleadings and documents on file, and on the declaration of Noelle E. Dwarzski, one of the plaintiffs' attorneys.

1 Dated: March 25, 2016

/s/ Noelle E. Dwarzski  
Noelle E. Dwarzski, WSBA #40041  
McKENZIE ROTHWELL BARLOW  
& COUGHRAN, P.S.  
Attorneys for Plaintiffs

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8 CERTIFICATE OF SERVICE

9 I hereby certify under penalty of perjury under the laws of the State of Washington  
10 that on this 25<sup>th</sup> day of March, 2016 I electronically filed the foregoing with the Clerk of the  
Court using the CM/ECF system which will send notification to all parties registered with  
CM/ECF in this matter. Defendant Kelaye Concrete LLC has not appeared in this matter.

11 Dated this 25<sup>th</sup> day of March, 2016, at Seattle, Washington.

12 /s/ Noelle E. Dwarzski  
Noelle E. Dwarzski, WSBA #40041  
13 McKENZIE ROTHWELL BARLOW  
& COUGHRAN, P.S.  
14 Attorneys for Plaintiffs  
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